STATE OF NEW HAMPSHIRE

STATE IMPLEMENTATION PLAN REVISION

CARBON MONOXIDE LIMITED MAINTENANCE PLAN
for the
THE CITY OF MANCHESTER AND THE CITY OF NASHUA
CARBON MONOXIDE MAINTENANCE AREAS

August 1, 2012

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1. Introduction

The City of Manchester (Manchester) and the City of Nashua (Nashua) were designated nonattainment by the U.S. Environmental Protection Agency (EPA) for carbon monoxide (CO) in 1980 (45 FR 24869 and 48 FR 29479, respectively). The National Ambient Air Quality Standard (NAAQS) for CO is 9.0 parts per million (ppm) for an 8-hour average concentration and 35 ppm for a 1-hour concentration, not to be exceeded more than once per calendar year. In 1991, following passage of the Clean Air Act Amendments of 1990 (CAA), both cities were classified "nonattainment" and "not classified" (56 FR 56694) although ambient monitoring showed NAAQS attainment had been achieved by that time. In February 1999, the State of New Hampshire submitted a formal CO redesignation request as part of a CO Maintenance Plan for Manchester and Nashua and, effective January 29, 2001, EPA redesignated Manchester (65 FR 71078) and Nashua (65 FR 71078) from CO nonattainment, to CO attainment and approved New Hampshire's CO Maintenance Plan.

Significant progress continues to be made in reducing CO levels across the northeast including the Manchester and Nashua areas. Dramatic reductions in CO levels from more fuel-efficient and cleaner operating vehicles, improved (OBD II) vehicle diagnostic equipment and cleaner burning fuels have cut CO emissions despite growth. No violations of the CO NAAQS have been recorded in the Manchester or Nashua areas since 1986 and the highest level of CO in either town in the last three years has been less than one half of the CO NAAQS. In addition to the downward trend shown by the monitoring data, the state has performed mobile source modeling and conformity analyses that indicate winter CO emissions in Manchester and Nashua will not reach even half of the CO Conformity Budget as far into the future as 2035, well beyond the end of the maintenance plan.

Section 175A of the CAA requires a demonstration of continued attainment for at least ten years following EPA's redesignation to attainment. Eight years after the redesignation, a state must submit a revised maintenance plan demonstrating attainment for the ten years following the initial ten-year period. Although New Hampshire's 1999 redesignation submittal was developed as a 20-year maintenance plan starting with the CO redesignation effective date, the New Hampshire Department of Environmental Services (DES) is submitting this State Implementation Plan (SIP) revision under the limited maintenance plan option as described in an October 6, 1995, U.S. EPA guidance memorandum ("Option Memo") (Attachment 1).[1] This maintenance plan is being submitted to cover the second 10-year maintenance period starting January 29, 2011 and running through January 29, 2021.

2. Background

The cities of Manchester and Nashua were designated CO nonattainment areas on April 11, 1980. Pursuant to Section 107(d)(1)(C) of the CAA , the cities retained their designation of nonattainment for CO under the law even though that at the same time, the cities were

[1] Memorandum: "Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Areas"; Joseph W. Paisie, Group Leader; Integrated Policy and Strategies Group; October 6, 1995

classified as "not classified" since ambient monitoring data for the areas showed attainment of the CO NAAQS. In 1987, the State of New Hampshire initiated a basic CO Inspection/Maintenance (I/M) program in Nashua and 11 surrounding towns. That program was designed to cease operating on January 1, 1995, at which time the State legislature allowed it to end. On February 1, 1999, DES submitted a revision to the SIP to remove the Nashua I/M program. That program was replaced with controls consisting of the existing federal Tier 1 emission standards for new vehicles and the federal reformulated gasoline program. Because the Manchester and Nashua areas were "not classified" under Section 172, the CAA set forth the applicable requirements for nonattainment areas. The CAA required such an area to achieve the standard by November 15, 1995, and both cities have fulfilled this requirement.

On February 2, 1999, DES submitted a request to redesignate the cities of Manchester and Nashua from CO nonattainment areas to CO attainment areas. EPA approved the redesignation in November, 2000 (65 FR 71060). As part of the redesignation request, the State submitted a maintenance plan as required by 175A of the Clean Air Act, as amended in 1990. Elements of the Section 175A maintenance plan included a base year (1990 attainment year) emission inventory for CO, a demonstration of NAAQS maintenance, a plan to verify continued attainment, a contingency plan and an obligation to submit additional information acknowledging that the maintenance plan would remain in effect through the year 2020, as required by the CAA. The redesignation request established a Manchester motor vehicle emissions budget of 55.83 tons per day and a Nashua motor vehicles CO emission budget of 60.13 tons per day to be used in determining transportation conformity in the Manchester and Nashua areas.

On May 30, 2007, DES submitted a modification of the approved Nashua maintenance plan, discontinuing CO monitoring in Nashua, which was approved by EPA on September 10, 2007 (72 FR 51564). Under that modification, DES agreed to continue to collect and review CO monitoring data from nearby Manchester. In the event monitoring data showed CO levels in Manchester reached 75% of the federal 1-hour or 8-hour NAAQS CO limit, an operating monitoring site in Nashua would be re-established and DES would resume analyzing and reporting monitoring data. New Hampshire is now proposing to discontinue CO monitoring in Manchester and to rely instead on the monitoring station in nearby Londonderry.

3. Limited Maintenance Plan Option

On October 6, 1995, EPA published the Joseph W. Paisie Limited Maintenance Plan Option Memo. Based on that guidance, the core elements of a Limited Maintenance Plan are:

- Attainment inventory identifying the levels of emissions in an area;
- Maintenance Demonstration showing that design values do not exceed 85% of the NAAQS;
- Monitoring to verify continued eligibility;

- Contingency Plan identifying measures to be adopted in the event of a NAAQS violation; and

- Conformity Determination discussion.

3.1 Attainment Inventory

Regarding the attainment inventory, the Option Memo notes that "[t]he State should develop an attainment emissions inventory to identify a level of emissions in the area which is sufficient to attain the NAAQS. This inventory should be consistent with EPA's most recent guidance on emissions inventories for nonattainment areas available at the time and should represent emissions during the time period associated with the monitoring data showing attainment. The inventory should be based on actual 'typical winter day' emissions of CO." To this end, DES has prepared an attainment inventory for year 2008 for Hillsborough County which encompasses the cities of Manchester and Nashua.

The 2008 attainment inventory is subdivided into the following general emissions categories:

- *Point Sources*, which represent discrete facilities. These sources usually must meet certain emission criteria to be included as point sources and generally represent larger facilities.
- *Area Sources*, which represent facilities and activities too numerous and widespread to be inventoried individually but which collectively may account for significant emissions.
- *Non-Road Mobile Sources*, including aircraft, locomotives, commercial marine vessels, construction vehicles, lawn & garden equipment, and other mobile vehicles and equipment that are not meant to be operated on roadways.
- *On-Road Mobile Sources*, including cars, trucks, buses, motorcycles, and other vehicles that operate on public roadways.

The methodologies used in preparing the 2008 emissions estimates are summarized in the following paragraphs.

For **point sources**, affected facilities in New Hampshire are required to report their emissions on an annual basis. The reporting requirements for these facilities are provided under New Hampshire's air regulations, its state air permitting program, and the Air Emissions Reporting Requirement. Data submitted by these facilities are extensively cross-checked and quality assured by DES staff before eventual submittal to EPA. The point source data contained in New Hampshire's 2008 attainment inventory originated from the quality-assured 2008 data from all reporting point sources in Hillsborough County.

The methodologies used to estimate emissions for **area source** categories come primarily from EPA's Emissions Inventory Improvement Program (EIIP). Calculations for many area source categories are based on variables such as population, employment, and fuel consumption data. Descriptions of the methodologies for specific area source categories can be found in EIIP Volume 3, *Area Sources*, which is available at EPA's Clearinghouse for Inventories and Emissions Factors website at http://www.epa.gov/ttn/chief/eiip/techreport/volume03/index.html. Seasonal adjustment factors from Table 1.4-3 of EIIP Volume III were used to derive winter season day estimates for the applicable source categories (e.g. residential heating).

For the **non-road mobile** category, DES used EPA's NONROAD2008a model to estimate 2008 emissions for those equipment types that are included in the model. The NONROAD model was run for a winter season day. For commercial aircraft and airport ground service equipment, the Federal Aviation Agency's (FAA's) Emissions & Dispersion Modeling System (EDMS) was used. Standardized methodologies and references were employed for equipment types not included in the EDMS or NONROAD models (e.g., locomotives and commercial marine vessels).

For **on-road mobile** sources, DES used MOVES2010a with VMT and other road related data provided by the relevant metropolitan planning organizations (MPOs) as well as vehicle population data obtained from the New Hampshire Department of Safety, Division of Motor Vehicles.

Estimated winter day CO emissions for the 2008 attainment inventory are shown in Table 1.

Table 1 - Winter Day CO Emissions for Hillsborough County, 2008

Category	CO emissions (tons per winter day)
Point	0.6*
Area	37.1
Non-Road Mobile	40.0
On-Road Mobile	165
Total	**242.7**

*Estimated tons per average day
On-Road Mobile emissions generated using MOVES2010a

Tables 2 and 3 illustrate annual CO emissions in the Manchester and Nashua area (Hillsborough County) and statewide. As Table 2 demonstrates, the total 2008 Hillsborough County emissions from all sources are estimated to be 77,311 tons with all mobile sources estimated to contribute 40,576 tons or 52% of the total.

Table 2 - CO Emissions for Hillsborough County, 1999 – 2008

	CO emissions (tons per year)			
Category	1999	2002	2005	2008
Point	184	143	191	92
Area	12,822	12,864	13,210	13,384
Non-Road Mobile	32,162	29,216	26,776	23,259
On-Road Mobile	92,831	58,379	58,666	40,576
Total	137,999	100,602	98,841	77,311

Sources of Data
1999 and 2002: National Emissions Inventory data from EPA's Air Data website.
2005: 2005 National Emissions Inventory, Version 2 downloaded from EPA's CHIEF website.
2008: 2008 National Emissions Inventory, Version 1.5 downloaded from EPA's EIS Gateway.

Table 3 - CO Emissions for New Hampshire, 1999 - 2008

	CO emissions (tons per year)			
Category	1999	2002	2005	2008
Point	4,923	2,724	4,754	3,357
Area	78,133	74,099	73,706	47,798
Non-Road Mobile	123,530	124,801	119,322	104,887
On-Road Mobile	345,413	294,533	236,990	174,154
Total	552,000	496,157	434,772	330,196

Sources of Data
1999 and 2002: National Emissions Inventory data from EPA's Air Data website.
2005: 2005 National Emissions Inventory, Version 2 downloaded from EPA's CHIEF website.
2008: 2008 National Emissions Inventory, Version 1.5 downloaded from EPA's EIS Gateway.

From 1999 to 2008, CO mobile source emissions declined by 49% in Hillsborough County and by 22%, statewide. Monitored levels of CO have continued to decrease over the last decade and the modeled emissions of CO from on-road sources mirror this downward trend. The availability of cleaner cars through the Federal Motor Vehicle Control Program, together with the addition of local transportation controls such as New Hampshire's Inspection & Maintenance Program, including an annual On-Board Diagnostics inspection, have resulted in decreased emissions and, hence, lower CO concentrations.

3.2. Demonstration of Continued Attainment

According to the Option Memo, "[t]he maintenance demonstration requirement is considered to be satisfied if the monitoring data show that the area is meeting the air quality criteria for limited maintenance areas (7.65 ppm or 85% of the CO NAAQS) . There is no requirement to project emissions over the maintenance period. EPA believes if the area

begins the maintenance period at or below 85 percent of exceedance levels, the air quality along with the continued applicability of PSD requirements, any control measures already in the SIP, and Federal measures, should provide adequate assurance of maintenance over the initial 10-year maintenance period.

When EPA approves a limited maintenance plan, EPA is concluding that an emissions budget may be treated as essentially not constraining for the length of the maintenance period because it is unreasonable to expect that such an area will experience so much growth in that period that a violation of the CO NAAQS would result." DES interprets this to mean that such an area is no longer required to demonstrate conformity to a CO motor vehicle emissions budget.

To qualify for the limited maintenance plan option, the CO Design Value for the area must be at or below 7.65 ppm (85% of the NAAQS 8-hour level of 9 ppm), based on at least 8 consecutive quarters (2 years) of data used to demonstrate attainment. Observation of the second highest 8-hour concentration is also an indicator of the area's proximity to violating the standard.

2000 to 2010 1-hour and 8-hour Design Values and 1-hour and 8-hour second highest CO concentrations for Manchester and Nashua are summarized in Tables 4 and 5. The annual 1-hour and 8-hour second highest concentrations are represented graphically in Figures 1 and 2. In all cases, the design values and second highest concentrations are significantly less than the 7.65 ppm threshold specified in EPA guidance, thus making each area eligible for the limited maintenance plan option.

Table 4 - 1-hour and 8-hour Design Values by year (Manchester and Nashua)*

	Manchester				Nashua	
	Bridge St		Pearl St		Main St	
Year	1-hr	8-hr	1-hr	8-hr	1-hr	8-hr
2000						
2001	7.1	3.6			8	4.1
2002			3.7	2	6.5	4
2003			4.8	3.4	6.2	4
2004			4.8	3.4	6.2	4
2005			2.8	1.8	6.1	3.2
2006			8.1	3	9.1	3.2
2007			8.1	3	9.1	2.4
2008			6	3.5		
2009			6	3.5		
2010			3.2	2.4		

* Note: Because CO Design Values are based on the higher value between one year and the previous year, there is no design value for 2000, the first year in which data was recorded.

Table 5 – 1-hour and 8-hour 2nd high concentrations by year (Manchester and Nashua)

	Manchester				Nashua	
	Bridge St		Pearl St		Main St	
Year	1-hr	8-hr	1-hr	8-hr	1-hr	8-hr
2000	7.1	3.6			8	4.1
2001	4.6	3.1			6.5	4
2002			3.7	2	5.9	3.7
2003			4.8	3.4	6.2	4
2004			2.2	1.4	4.3	2.8
2005			2.8	1.8	6.1	3.2
2006			8.1	3	9.1	2.4
2007			2.6	1.8	3.7	2.2
2008			6	3.5		
2009			3.2	2		
2010			3.1	2.4		

Figure 1 - Annual 1-Hour 2nd Highest Concentrations - 2000 - 2010

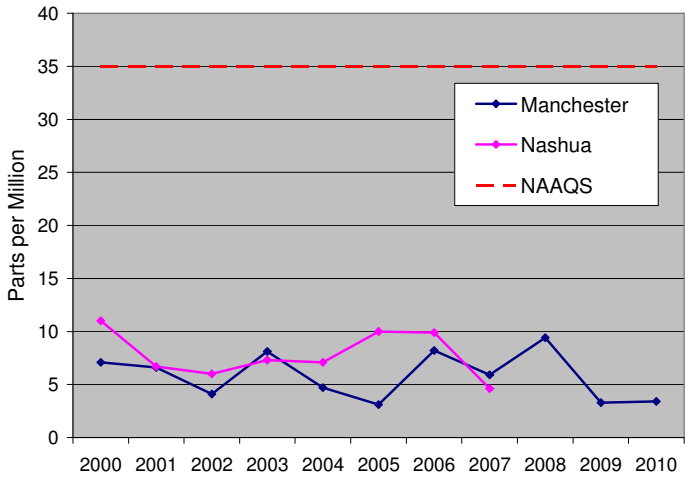
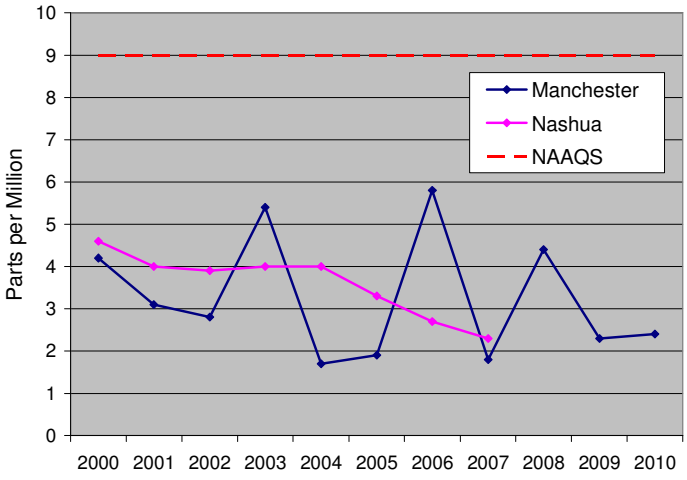


Figure 2 - Annual 8-Hour 2nd Highest Concentrations - 2000 - 2010



3.3. Monitoring Network/Verification of Continued Attainment

With respect to monitoring, the Option Memo reads: "To verify the attainment status of the area over the maintenance period, the maintenance plan should contain provisions for continued operation of an appropriate, EPA-approved air quality monitoring network, in accordance with 40 CFR 58. This is particularly important for areas using a limited maintenance plan, because there wi11 be no cap on emissions."

As part of this Limited CO Maintenance Plan, New Hampshire is proposing to discontinue monitoring CO at its Manchester site. In lieu of operating that site, DES plans to track CO using data collected from the following sources:

1. CO monitoring will continue year-round at the Londonderry Moose Hill station in Londonderry. The Londonderry Moose Hill Station came online on January 1, 2011 as an NCore[2] superstation measuring a wide variety of pollutants. DES worked closely with EPA to carefully select this site due to its central proximity to Manchester and Nashua. The Londonderry station measures PM 2.5 (continuous and filter-based) Nitrogen Oxides, Ozone, Sulfur Dioxide (trace) and Carbon Monoxide (trace) as well as wind speed, wind direction and relative humidity.

2. New Hampshire's emissions inventory tabulates CO emissions from point, area and mobile sources. As demonstrated earlier (see Table 1), New Hampshire has been in attainment for CO since 1999 and the vast preponderance of NH CO emissions are from mobile sources. New Hampshire will continue to provide a multi-source inventory every 3 years that will be used for identifying CO mobile source emissions trends within the state.

A review of over 8,600 hourly samples taken since the Londonderry station came online shows 1-hour CO levels varying from 0.0 ppm to a high of 2.65 ppm at 2:00 AM on January 11, 2011. Because design values are based on two years of data, and the Londonderry station has been operating for only 15 months, it is not yet possible to calculate the maximum and second maximum 8-hour design values over two years as protocol requires. Using 15 months of values averaged over 8-hour non-overlappping periods, the maximum 8-hour highest and 2nd highest CO Design Values, are 1.77 and 1.23 ppm, respectively. Similar to the Nashua and Manchester station results, these levels are well below the CO NAAQS. The relatively short period of Londonderry station operation, however, makes it impossible to determine if there is a general downward trend in CO levels, as demonstrated by 10 years of data from the Nashua and Manchester stations.

Should the present downward trend of mobile source CO emissions reverse, and in the event the second-highest CO concentration in any calendar year monitored in Londonderry reaches 50 percent of either the federal 1-hour or 8-hour NAAQS for CO, New Hampshire will, within six months, reestablish a CO monitoring site in Manchester consistent with EPA siting criteria and resume analyzing and reporting those data. New Hampshire commits to implement its contingency program in Nashua in the event that a CO violation is monitored at the re-established Nashua monitoring site at any time during the

[2] One of the most significant changes in the EPA air monitoring regulations was the requirement to establish National Core (NCore) multi-pollutant monitoring stations. These stations will provide data on several pollutants at lower detection limits and replace the National Air Monitoring Station (NAMS) networks that have existed for several years.

maintenance period. If the Manchester CO monitor measures a violation of the either the federal 1-hour or 8-hour NAAQS for CO, contingency measures will be implemented in Nashua as well, until a re-established CO monitor in Nashua shows that the area is in attainment of the CO standard.

3.4. Contingency Plan

According to the Option Memo, "Section 175A of the CAA requires that a maintenance plan include contingency provisions, as necessary, to promptly correct any violation of the NAAQS that occurs after redesignation of the area. These contingency measures do not have to be fully adopted at the time of redesignation. However, the contingency plan is considered to be an enforceable part of the SIP and should ensure that the contingency measures are adopted expeditiously once they are triggered by a specified event. The contingency plan should identify the measures to be promptly adopted and provide a schedule and procedure for adoption and implementation of the measures. The State should also identify specific indicators, or triggers, that will be used to determine when the contingency measures need to be implemented. While an exceedance of the NAAQS is an acceptable trigger, States may wish to choose a pre-exceedance action level as a trigger. By taking early action, a State may be able to prevent any actual violation of the NAAQS and, therefore, eliminate any need on the part of EPA to redesignate an area back to nonattainment."

DES believes that specific contingency measures are not needed at the present time, since the current CO levels are so far below the NAAQS, and since emissions from mobile sources, the dominant source of CO in the State and Manchester and Nashua regions, are decreasing in spite of increasing population. As mentioned, previously implemented contingency measures and emissions reductions strategies have proven successful, and these will be continued through the maintenance period. These include:

- Vehicle Inspection/Maintenance (I/M) - Although federal regulations (40 CFR 51.350) required New Hampshire to implement an I/M program with tailpipe emissions testing, New Hampshire's program of anti-tampering inspections for pre-1996 vehicles less than 20 years old and an OBD II inspection on all model years 1996 and newer has provided superior environmental benefits to expensive and onerous tailpipe testing. New Hampshire will continue its EPA-approved OBD II program as a SIP strengthening measure.

- Vehicle Miles Traveled reductions – Reducing vehicle use and traffic congestion, and their associated emissions, are key state and local transportation objectives. DES will continue to work with DOT and regional MPOs to identify effective congestion and emission reduction project and programs such as such as traffic signal coordination, increased mass transit, RideShare, anti-idling and other traffic management strategies.

- Emissions reductions – New Hampshire continues to enjoy the benefits of the Federal Clean Fuel Programs that resulted in reduced CO emissions. In keeping with President Obama's 2009 national fuel economy and emissions policy, DES and local MPOs are actively promoting low emissions vehicles and emissions reductions strategies such as anti-idling programs and park & ride lot construction as part of their long range transportation plans.

Because New Hampshire proposes to discontinue monitoring CO in Manchester, it will adopt a more stringent contingency threshold or "trigger" than indicated in the 2007 SIP revision. As indicated in Section 3.3 above, New Hampshire will monitor CO levels using the Londonderry Moose Hill station and emissions inventories. In the event the second-highest CO concentration in any calendar year monitored in Londonderry reaches 50 percent of the federal 1-hour or 8-hour NAAQS for CO, New Hampshire will, within six months of recording such concentrations, reestablish the CO monitoring site in Manchester consistent with EPA siting criteria, and resume analyzing and reporting those data. New Hampshire commits to implement a contingency program in Nashua in the event that a CO violation is monitored at the re-established Nashua monitoring site at any time during the maintenance period. If the Manchester CO monitor measures a violation of the either the federal 1-hour or 8-hour NAAQS for CO, contingency measures will be implemented in Nashua as well, until a re-established CO monitor in Nashua shows that the area is in attainment of the CO standard.

3.5. Conformity Determination under Limited Maintenance Plans

In discussing conformity, the Option Memo reads: "The transportation conformity rule (*Determining Conformity of Federal Actions to State or Federal Implementation Plans*; 40 CFR 93; amended 1998) and the general conformity rule (*Requirements for Preparation, Adoption, and Submittal of Implementation Plans;* 40 CFR 51; adopted 1994) apply to nonattainment areas and maintenance areas operating under maintenance plans. Under either rule, one means of demonstrating conformity of Federal actions is to indicate that expected emissions from planned actions are consistent with the emissions budgets for the area. Emissions budgets in limited maintenance plan areas may be treated as essentially not constraining for the length of the initial maintenance period because it is unreasonable to expect that such an area will experience so much growth in that period that a violation of the CO NAAQS would result. In other words, EPA would be concluding that emissions need not be capped for the maintenance period. Therefore, in areas with approved limited maintenance plans, Federal actions requiring conformity determinations under the transportation conformity rule could be considered to satisfy the 'budget test' required in 40 CFR 93.118, 93.119, and 93.120 of the rule. Similarly, in these areas, Federal actions subject to the general conformity rule could be considered to satisfy the 'budget test' specified in section 93.158 (a) (5) (i) (A) of the rule." As this is guidance, final and binding determinations regarding the eligibility of areas for the limited maintenance plan option will only be made in the context of notice and comment rulemaking actions regarding specific redesignation requests.

In recent conformity determinations (see attachment 2: May 4, 2011 letter to FHWA Administrator Ms. Kathleen O. Laffey from EPA Air Quality Planning Unit Manager Anne E. Arnold) the Southern NH MPO and the Nashua MPO have demonstrated that transportation conformity for the Manchester and Nashua CO attainment areas and the motor vehicle emissions for future years are consistent with the 2010 motor vehicles emissions budgets of 55.83 tons of CO per winter day in Manchester and 60.13 tons of CO per day in Nashua (Tables 6 and 7). In fact, the projected CO emissions are less than half of the budgets in both areas.

Table 6 – Manchester CO Conformity Determination Projection

Carbon Monoxide Analysis Summary for the City of Manchester		
Year	**CO tons/day (winter)**	**CO Budget (tons/day)**
2012	28.80	55.83
2017	26.65	55.83
2026	26.38	55.83
2035	27.66	55.83

Table 7 – Nashua CO Conformity Determination Projection

Carbon Monoxide Analysis Summary for the Nashua		
Year	**CO tons/day (winter)**	**CO Budget (tons/day)**
2012	28.73	60.13
2017	26.11	60.13
2026	25.51	60.13
2035	26.64	60.13

Consistent with Mr. Paisie's and Ms. Arnold's memos, DES will use the Interagency Consultation (IAC) process to inform the New Hampshire Department of Transportation (NHDOT) and MPOs that, upon approval of the limited maintenance plans, CO emissions budgets will no longer be constraining for transportation conformity because of the low levels of emissions, continued CO reductions resulting from 2000 Maintenance Plan reduction measures implementation, and expected growth during the maintenance period.

EPA further discusses the implications of a Limited Maintenance Plan (LMP) on conformity requirements in an August 21, 2001 guidance memorandum to EPA Regional Air Directors (see attachment 3: Lydia Wegman memorandum; *Limited Maintenance Plan Option for Moderate PM_{10} Nonattainment Areas*). That memo reads in part, "Emissions Budgets in LMP areas may be treated as essentially not constraining for the length of the maintenance period because it is unreasonable to expect that an area satisfying the LMP criteria will experience so much growth during that period of time such that a violation of the PM_{10} NAAQS would result. While this policy does not exempt an area from the need to affirm conformity, it does allow the area to demonstrate conformity without undertaking certain requirements of these rules. For transportation conformity purposes, EPA would be concluding that emissions in these areas need not be capped for the maintenance period, and, therefore, a regional emissions analysis would not be required." As this guidance

suggests, New Hampshire will still be subject to CAA requirements to ensure CO conformity in LMP areas, but MPOs will not be required to provide regional analyses as long as LMP conditions are met. However, this is not to say that MPOs no longer have responsibility for ensuring individual transportation projects do not cause or contribute to any new localized CO violations. As per 40 CFR 93.116, project sponsors will still be required to perform hot-spot analyses for FHWA/FTA projects to demonstrate no new local violations will be created as a result of the projects.

4. Conclusion

CO levels in the Nashua and Manchester maintenance areas have remained under the CO standard as a result of national and local control strategies implemented. In fact, the current design value for both areas is less than half the standard. The current design values in the areas have remained below the standard since both areas were designated and are expected to continue to maintain compliance with the standard. New Hampshire has verified that the emission controls adopted to maintain the standard continue to be permanent and enforceable, that there are no new significant sources of carbon monoxide or increases in background emissions and that the state has in place a program to identify sources of exceedance and address any violation through enforcement and implementation of a contingency plan.

This plan satisfies New Hampshire's obligation under Section 175A(b) of the CAA to submit a plan for maintaining the national primary ambient air quality standard for CO for the next ten years beyond the current maintenance plan.

5. Public Record & Comment

In accordance with 40 CFR 51.102, public participation in this request was provided as follows:

Notice of availability of the complete document and a notice of opportunity for the public to submit written comments and request a public hearing were published on June 22, 2012, in the UNION LEADER and posted on the DES website at http://des.nh.gov/organization/divisions/air/tsb/tps/msp/categories/hot.htm.

The comment period closed at 4:00 PM on July 23, 2012. During that period, a public hearing on the proposed plan was not requested. The only comments received on the proposed plan were from EPA by letter dated July 19, 2012. EPA stated that, in the unlikely event monitors should ever measure a violation or concentrations such that the design value exceeds 85% of the CO NAAQS, a full maintenance plan must be developed. In addition, EPA noted that the effective date of the CO redesignation was January 29, 2001, thereby establishing January 29, 2021 as the end of the 20-year maintenance period. The plan was revised to reflect this date.

A copy of the legal public notice can be found as Attachment 4 and a copy of proof of publication can be found as Attachment 5.